

**Hearing Date:** June 15, 2023, at 11:00 a.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT**

**SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF DEBTORS’ REVISED PROPOSED ORDER  
ESTABLISHING PROCEDURES AND A SCHEDULE FOR ESTIMATING THE  
AMOUNT OF THE FTX DEBTORS’ CLAIMS AGAINST THE DEBTORS UNDER  
BANKRUPTCY CODE SECTIONS 105(a) AND 502(c) AND BANKRUPTCY RULE 3018**

**PLEASE TAKE NOTICE** that, on January 19, 2023 (the “Petition Date”), Genesis Global Holdco, LLC and its affiliates Genesis Global Capital, LLC and Genesis Asia Pacific Pte. Ltd., as debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors” and the cases, the “Chapter 11 Cases”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that on June 1, 2023, the Debtors filed the *Motion to Establish Procedures and a Schedule for Estimating the Amount of the FTX Debtors’*

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

*Claims Against the Debtors Under Bankruptcy Code Sections 105(a) And 502(c) and Bankruptcy Rule 3018*, ECF No. 373 (the “Motion”), which attached a proposed order as Exhibit A thereto (the “Proposed Order”) and a proposed estimation schedule as Exhibit B thereto (the “Estimation Schedule”).

**PLEASE TAKE FUTHER NOTICE** that on June 13, 2023, the Debtors filed a revised version of the Proposed Order (the “Revised Proposed Order”), attached hereto as Exhibit A. A blackline of the Revised Proposed Order against the Proposed Order originally submitted with the Motion is attached hereto as Exhibit B.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Hearing”) has been scheduled for **June 15, 2023, at 11:00 a.m. (Prevailing Eastern Time)** before the Honorable Judge Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York pursuant to the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 44, the “Case Management Order”), at which Hearing the Motion will be heard. The Hearing will be conducted only through Zoom for government.

**PLEASE TAKE FURTHER NOTICE** that parties wishing to register for the Zoom hearing should use the eCourt Appearances link on the Court’s website: <https://www.nysb.uscourts.gov/ecourt-appearances>. After the deadline to make appearances passes, the Court will circulate by email prior to the Hearing the Zoom links to those persons who made eCourt Appearances, using the email addresses submitted with those appearances. Members of the public who wish to listen to, but not participate in, the Hearing free of charge may do so by calling the following muted, listen-only number: 1-929-205-6099, Access Code: 92353761344#.

**PLEASE TAKE FURTHER NOTICE** that copies of the Motion can be viewed and/or obtained: (i) by accessing the Court’s website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) or (ii) from the Debtors’ notice and claims agent, Kroll Restructuring Administration LLC, located at 55 East 52nd Street, 17th Floor, New York, NY 10055, at <https://restructuring.ra.kroll.com/genesis/> or by calling +1 888-524-2017. Note that a PACER password is needed to access documents on the Court’s website.

**PLEASE TAKE FURTHER NOTICE** that the relief requested in the Motion may affect your rights. Please read the below pleadings to be heard at the Hearing carefully and, if you have one available, discuss them with your attorney. (If you do not have an attorney, you should consider consulting with one.)

**PLEASE TAKE FURTHER NOTICE** that, if you oppose the relief requested in the Motion, or if you want the Court to hear your position on the Motion, then you or your attorney must timely file an Objection and attend the Hearing. If you or your attorney do not follow the foregoing steps, the Court may decide that you do not oppose the relief requested in the Motion and may enter orders granting the relief requested by the Debtors.

Dated: June 14, 2023  
New York, New York

/s/ Jane VanLare

Sean A. O'Neal

Luke A. Barefoot

Jane VanLare

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*Counsel for the Debtors  
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**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER ESTABLISHING  
PROCEDURES AND A SCHEDULE FOR ESTIMATING THE  
AMOUNT OF THE FTX DEBTORS' CLAIMS AGAINST THE DEBTORS UNDER  
BANKRUPTCY CODE SECTIONS 105(a) AND 502(c) AND BANKRUPTCY RULE 3018**

Upon the Motion<sup>1</sup> of Genesis Global Holdco, LLC ("Holdco") and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), for approval pursuant to sections 105(a) and 502(c) of the Bankruptcy Code and rule 3018 of the Bankruptcy Rules to establish procedures and a schedule for estimating the amount of the FTX Claims (as defined herein) against the Debtors at \$0.00 for purposes of allowance, distribution and voting, all as described more fully in the Motion, and upon the First Day Declarations; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the Southern District of New York dated January 31, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having

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<sup>1</sup> All capitalized terms used and not defined herein shall have the meanings ascribed to them in the Motion.

found that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors and other parties in interest; and the Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion was appropriate and no other notice need be provided; and the Court having determined that the legal bases set forth in the Motion and on the record of the Hearing establish just cause for the relief granted herein; and all objections to the Motion (if any) having been withdrawn or overruled; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED.
2. All claims asserted by the FTX Debtors against the Debtors in the Proofs of Claim<sup>2</sup> shall be estimated pursuant to 11 U.S.C. § 502(c) and rule 3018 of Federal Rules of Bankruptcy Procedure for purposes of allowance, distribution, and voting in accordance with the Estimation Schedule. The Estimation Schedule may be amended by agreement of the Debtors and the FTX Debtors, following consultation with the Committee, or upon further order of this Court.
3. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2023  
New York, New York

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THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

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<sup>2</sup> On May 22, 2023, FTX Trading Ltd. filed Claim No. 415 against Holdco, Claim No. 419 against Genesis Asia Pacific, Ltd. ("GAP"), and Claim No. 426 against GGC; Alameda Research LLC filed Claim No. 422 against Holdco, Claim No. 420 against GAP, and Claim No. 513 against GGC; Alameda Research Ltd. filed Claim No. 508 against Holdco, Claim No. 457 against GAP, and Claim No. 512 against GGC; and West Realm Shires Inc. filed Claim No. 465 against Holdco, Claims Nos. 432 and 463 against GAP, and Claims Nos. 438, 515, and 516 against GGC (the proofs of claim collectively, the "Proofs of Claim" and the claims identified therein, the "FTX Claims").

**EXHIBIT B**

**Blackline of Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER ESTABLISHING  
PROCEDURES AND A SCHEDULE FOR ESTIMATING THE  
AMOUNT OF THE FTX DEBTORS' CLAIMS AGAINST THE DEBTORS UNDER  
BANKRUPTCY CODE SECTIONS 105(a) AND 502(c) AND BANKRUPTCY RULE 3018**

Upon the Motion<sup>1</sup> of Genesis Global Holdco, LLC (“Holdco”) and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), for approval pursuant to sections 105(a) and 502(c) of the Bankruptcy Code and rule 3018 of the Bankruptcy Rules to establish procedures and a schedule for estimating the amount of the FTX Claims [\(as defined herein\)](#) against the Debtors at \$0.00 for purposes of allowance, distribution and voting, all as described more fully in the Motion, and upon the First Day Declarations; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the Southern District of New York dated January 31, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best

<sup>1</sup> All capitalized terms used and not defined herein shall have the meanings ascribed to them in the Motion.

interests of the Debtors, their estates, their creditors and other parties in interest; and the Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion was appropriate and no other notice need be provided; and the Court having determined that the legal bases set forth in the Motion and on the record of the Hearing establish just cause for the relief granted herein; and all objections to the Motion (if any) having been withdrawn or overruled; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED.
2. All claims asserted by the FTX Debtors against the Debtors in the Proofs of Claim<sup>2</sup> shall be estimated pursuant to 11 U.S.C. § 502(c) and rule 3018 of Federal Rules of Bankruptcy Procedure for purposes of allowance, distribution, and voting in accordance with the Estimation Schedule. The Estimation Schedule may be amended by agreement of the Debtors and the FTX Debtors, following consultation with the Committee, or upon further order of this Court.
3. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2023  
New York, New York

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THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

<sup>2</sup> On May 22, 2023, FTX Trading Ltd. filed Claim No. 415 against Holdco, Claim No. 419 against Genesis Asia Pacific, Ltd. ("GAP"), and Claim No. 426 against GGC; Alameda Research LLC filed Claim No. 422 against Holdco, Claim No. 420 against GAP, and Claim No. 513 against GGC; Alameda Research Ltd. filed Claim No. 508 against Holdco, Claim No. 457 against GAP, and Claim No. 512 against GGC; and West Realm Shires Inc. filed Claim No. 465 against Holdco, Claims Nos. 432 and 463 against GAP, and Claims Nos. 438, 515, and 516 against GGC (the proofs of claim collectively, the "Proofs of Claim" and the claims identified therein, the "FTX Claims").